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February 16, 2004

Deborah Taylor Tate, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

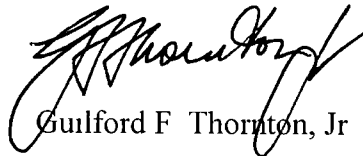
RE Complaint of Ben Lomand Communications, Inc Against Citizens  
Telecommunications Company of Tennessee, LLC  
Docket No 02-01221

Dear Chairman Tate

On behalf of Citizens Telecommunications Company of Tennessee, LLC, I am enclosing an original and 13 copies of additional discovery responses, consistent with the order issued by Hearing Officer Randal Gilliam on February 6, 2004 in this matter. A copy has been served on opposing counsel.

Should you have any questions or require anything further at this time, please do not hesitate to contact me.

Sincerely,



Guilford F Thornton, Jr

cc Mike Swatts  
Gregg Sayre

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>COMPLAINT OF BEN LOMAND</b>	)	
<b>COMMUNICATIONS, INC.</b>	)	
	)	
<b>Against</b>	)	<b>DOCKET NO. 02-01221</b>
	)	
<b>CITIZENS TELECOMMUNICATIONS</b>	)	
<b>COMPANY OF TENNESSEE, LLC</b>	)	
<b>d/b/a FRONTIER COMMUNICATIONS</b>	)	
<b>OF TENNESSEE</b>	)	

**CITIZENS' RESPONSE TO DISCOVERY REQUESTS PURSUANT TO  
ORDER PARTIALY GRANTING BEN LOMAND'S MOTION TO COMPEL**

Citizens Telecommunications Company of Tennessee, LLC ("Citizens") respectfully submits the following responses to the Discovery Requests propounded by Ben Lomand Communications, Inc ("BLC") in accordance with the Authority's Order, dated February 6, 2004

**I. INTERROGATORIES**

**INTERROGATORY 9:** In what exchanges in other states has Frontier and its affiliates offered tariffs similar to the April 11, 2002 Tariff in which the rates/tariffs are lower than in other Frontier exchanges in such state

**RESPONSE** Citizens' affiliates have established different market areas in response to competition with rates for specific services unique to the respective market area and or exchange  
The locations are as follows

**1. Citizens Telecommunications Company of West Virginia**

(A) Citizens' Select and Select Plus bundled offerings for residential customers has one rate for the Moorefield exchange (Market Area B) and a different rate for all other exchanges in WV. This rate adjustment was in response to Hardy Telephone cooperative overbuilding in our Moorefield exchange. The rate in Moorefield is from \$4.95 to \$8.95 lower per month than in other exchanges in WV.

(B) Citizens' Choices bundled offerings are segmented into three Market Areas in WV in response to competition. The Moorefield exchange has a unique rate in response to Hardy Telecommunications and still another rate exists for the Bluefield/Princeton market where FiberNet, a CLEC, is competing with Frontier. The rate disparity between the three market areas ranges from \$5 to \$10 per month.

(C) Citizens established a new service offering called ValuLine for business one-party customers and Automatic Access Line customers in competitive markets in WV. This service offering is available on term plans only (6 month, 1, 2, or 3 year contract) and offers a discounted rate over the month-to-month tariffed rate.

(D) Citizens' Feature Pack 5 and Feature Pack 5 w/ Voice Mail business bundles are offered in clearly defined competitive market areas on a term discount. The discount ranges from \$7.17 to \$13.95 depending on the market area and term.

**2. Frontier Communications of Minnesota, Inc.**

(A) Reductions in basic residence and business rates were approved specific to the Worthington exchange in 2000. A special Versaline Service bundle, offered only in the Worthington exchange, was approved in 2003.

(B) Established reduced residential and business rates for the urban areas only in the exchanges of Adrian and Edgerton in 2000 and in the Slayton and Lake Wilson exchanges in 2001. Reduced business urban rates for the Currie exchange in 2001.

(C) Frontier's Choices Tier Bundles one-year term plan is offered only in the exchanges of Apple Valley, Burnsville, Farmington, Lakeville, Rosemount, and Worthington in 2003.

**3. Citizens Telecommunications Company of Minnesota, LLC**

(A) In the exchanges of Milaca, Dodge Center, Blooming Prairie and Ellendale, Citizens' Choices Tier bundles are offered at lower rates than other Rate Group 1 exchanges in 2003.

**4. Citizens Telecommunications Company of Illinois**

(A) ValuLine Business rate lower in Jerseyville exchange beginning in 2003 than other Illinois exchanges.

INTERROGATORY NO. 10 For those exchanges and/or states listed in the answer to Interrogatory 9, list such rates/tariffs that have been rejected, revoked or disapproved by the respective public utility commissions.

RESPONSE No tariff filing in response to competitive pricing has been revoked, rejected or disapproved by the West Virginia Public Service Commission, the Illinois Commerce Commission or, except as noted below, the Minnesota Public Utilities Commission

In one case in Minnesota involving the Adrian and Edgerton exchanges, the PUC allowed Frontier to reduce rates only in the exchange's urban areas where they faced competition rather than throughout the entire exchange as originally proposed. For those exchanges, separate "urban" rate zones were established. In a similar case, Frontier initially proposed exchange-wide rate reductions in its Currie, Lake Wilson, and Slayton exchanges. Frontier subsequently revised its proposal, requesting that the proposed reduced rates apply only within the municipal boundaries, where it faced competition. The Minnesota PUC approved Frontier's revised proposal, with two exceptions. The Lake Wilson residential rate was reduced less than initially proposed by Frontier and the Currie residential rate was not reduced.

INTERROGATORY NO. 11 For those exchanges and/or states listed in the answer to Interrogatory 9, list the competitors (ILECS/CLECS) which terminated business in such exchanges, were sold to other competitors or Frontier and its affiliates or merged with another competitor or Frontier and its affiliates.

RESPONSE Every competitor that initially entered Citizens/Frontier's markets in West Virginia, Minnesota and Illinois which caused Frontier to establish competitive pricing on an exchange and or market area basis, is still in business. None have terminated service or have been sold.

INTERROGATORY NO 16 List the exchanges in Tennessee where Frontier is faced with competition from other landline competitors.

RESPONSE Citizens is facing varying degrees of competition from other landline competitors in its Dresden, Martin, Cookeville, Crossville, McMinnville, Sparta, Claxton and Powell exchanges

## **II. DATA REQUESTS**

DATA REQUEST NO 2 For the current month, year-to-date, and 12 months-to-date values indicated in Exhibit 1, Page 1 of 5, line 5 denominated "less Uncollectibles" associated with operating revenue, indicate the amount (by either absolute value or as a percentage of the total) of the uncollectibles associated with operating revenues derived from the Local Network category (line 1)

RESPONSE Of the total 12 months-to-date \$491K in Uncollectibles shown on our November 2002 report, the only breakout that can be provided is \$396.5K associated with our end user billing system which would include Local Network, Long Distance and Miscellaneous categories. This amount does not reflect recoveries. Consequently, Citizens cannot provide the breakdown requested in this data request.

DATA REQUEST NO 3 For the current month, year-to-date, and 12 months-to-date values indicated in Exhibit 1, Page 1 of 5, line 5 denominated "less Uncollectibles" associated with operating revenue, indicate the amount (by either absolute value or as a percentage of the total) of the uncollectibles associated with operating revenues derived from business rather than residential customers.

RESPONSE The portion of the Uncollectibles associated with the Local Network category cannot be separated between residence and business. Many billing codes represent a product and do not differentiate between classes of service. Consequently, such a breakdown cannot be provided.

VERIFICATION

STATE OF WEST VIRGINIA

COUNTY OF MERCER

I, James Michael Swatts, after first being duly sworn, state that I am Director of State Government Affairs for Citizens Communications Company of Tennessee, LLC, d/b/a Frontier Communications of Tennessee, and that, as such, I am authorized by Citizens Communications Company of Tennessee, LLC, d/b/a Frontier Communications of Tennessee to verify answers to the foregoing discovery requests and state that the answers thereto are true and correct to the best of my knowledge, information and belief

CITIZENS COMMUNICATIONS COMPANY  
OF TENNESSEE, LLC, d/b/a FRONTIER  
COMMUNICATIONS OF TENNESSEE

By James M Swatts  
Title DIRECTOR STATE GOVERNMENT AFFAIRS

Sworn to and subscribed  
before me on this 16th  
day of February, 2004.

Hazel Sizemore  
Notary Public

My Commission Expires: October 15, 2013





Respectfully submitted,



Guilford F Thornton, Jr (No 14508)

Charles W Cook, III (No 14274)

STOKES BARTHOLOMEW

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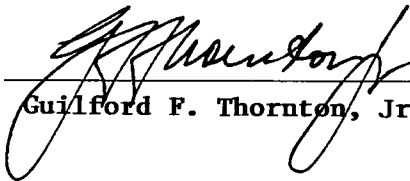
*Attorneys for Citizens Communications*

*Company of Tennessee, d/b/a Frontier*

*Communications of Tennessee*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on H LaDon Baltimore, Farrar & Bates, LLP, 211 Seventh Avenue, N , Suite 420, Nashville, Tennessee 37219 via Hand Delivery on this the 16th day of February, 2004



Guilford F. Thornton, Jr.